

Cohen, Dippell and Everist, P.C.

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Amendment of Part 74 of the)
Commission's Rules Regarding FM) MB Docket No. 18-119
Translator Interference)

Reply Comments
on Behalf of
COHEN, DIPPELL AND EVERIST, P.C.

The following reply comments are submitted on behalf of Cohen, Dippell and Everist, P.C. ("CDE") and is in response to the NPRM released by the Commission on May 10, 2018. CDE and its predecessors have practiced before the Federal Communications Commission ("FCC") for over 75 years in broadcast and telecommunications matters. The firm or its predecessors have been located in Washington, DC since 1937 and perform professional consulting engineering services to the communications industry.

The undersigned is licensed as a Professional Engineer in the District of Columbia and has been in continuous employment with this firm or its predecessors for over fifty (50) years.

A number of comments in this proceeding have been reviewed. Several filings cover the same general information outlined in the paper presented at the NAB by John Kean. That paper is entitled, *FM Directional Antennas and New FM Short Spacing Rule* and is published in the *1989 NAB Proceedings, 43rd Annual Broadcast Engineering Conference Proceeding¹* and therefore further comment is not made.

The submission by National Public Radio, Inc. makes a valid point that "FM translator service in 1970 as a broadcast service secondary to full power FM broadcast stations reaffirmed

¹Pages 55-61

that prioritization in 1990, and has maintained it ever since”². NPR further states that the FCC prioritized this concept in 1990.³ NPR quite properly cites several important FCC criteria and considerations.

- new or existing translator to operate on a non-interfering basis
- FM translator stations were to fill-in or to extend service

NPR then cites the FCC when it affirmed that a translator should not be the creation of a new transmission service.

The firm wholeheartedly subscribes to all the above FCC principles for FM translator service and believes that the principles are as valuable today and for the immediate future as they were when adopted in 1990.

This firm appreciates the Federal Communications Commission soliciting information in this important NPRM.

Respectfully Submitted,

COHEN, DIPPELL AND EVERIST, P.C.



Donald G. Everist
President

DATE: September 5, 2018

²NPR, Page 2, under Summary, 4th Line

³*In the Matter of Part 74 of the Commission's Rules concerning FM Translator Stations," 5 FCC Rcd 7212 (1990)*